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March 16, 2012

Mr. Jeff Jordan  
Supervisory Attorney  
Complaints Examination & Legal Administration  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Mr. Jordan:

We write in response to your inquiry regarding MUR 6535.

As an initial matter, we believe this inquiry is outside the scope of the Commission's authority. See 2 U.S.C. § 437g. The Complainant did not allege that Romney for President, Inc. ("RFP") did anything inappropriate at all. In fact, Section 109.23, upon which the Complaint is based, makes clear that absent certain facts *not at issue here*, "[t]he candidate who prepared the campaign material does not receive or accept an in-kind contribution[.]"

Because the Complainant did not claim misconduct by RFP, RFP has no information to provide. Yet, you suggest we provide a factual/legal analysis, along with statements under oath. Because no wrongdoing has been alleged, you are essentially asking us to provide sworn oaths from every single campaign staffer stating that each person understands and complies with the entirety of Title 11.

To be clear, RFP is familiar with the laws governing improper "coordination" with outside groups such as Restore Our Future. We have devoted *considerable* time and resources to complying with rules on coordination and other subjects under the Commission's jurisdiction. We will respond to allegations or Complaints actually grounded in fact, but we will not participate in a fishing expedition.

Sincerely,

Benjamin L. Ginsberg, National Counsel  
Kathryn E. Biber, General Counsel

[www.MittRomney.com](http://www.MittRomney.com)

Paid for by Romney for President, Inc.